

The Honorable David G. Estudillo

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

GABRIELLA SULLIVAN, et al.,

NO. 3:22-cv-05403-DGE

Plaintiffs,

STATE DEFENDANTS' RESPONSE TO
ALLIANCE FOR GUN
RESPONSIBILITY'S MOTION TO
INTERVENE AS A DEFENDANT

BOB FERGUSON, in his official capacity
as Washington State Attorney General, et
al.,

Defendants.

State Defendants Attorney General Ferguson and Chief Batiste respectfully submit this response in support of the Alliance for Gun Responsibility's Motion to Intervene as a Defendant (Dkt. # 45).

The State of Washington has been involved in several matters litigating the validity and constitutionality of state statutes proposed and promoted by various sponsors that have intervened to defend the law. *See, e.g., Thorsted v. Gregoire*, 841 F. Supp. 1068 (W.D. Wash. 1994), *aff'd*, 75 F.3d 454 (9th Cir. 1996); *Int'l Ass'n of Indep. Tanker Owners v. Lowry*, 947 F. Supp. 1484 (W.D. Wash. 1996), *aff'd in part, reversed in part sub nom. Int'l Ass'n of Indep. Tanker Owners v. Locke*, 148 F.3d 1053 (9th Cir. 1998), *reversed*, *United States v. Locke*, 529 U.S. 89 (2000); *Washington State Republican Party v. Logan*, 377 F. Supp. 2d 907 (W.D. Wash. 2005), *aff'd sub nom. Washington State Republican Party v. Washington*, 460 F.3d 1108 (9th Cir. 2006), *reversed sub nom.*

Washington State Grange v. Washington State Republican Party, 552 U.S. 442 (2008); *Washington Ass'n for Substance Abuse & Violence Prevention v. Washington*, 278 P.3d 632 (2012). The State's experience is that the sponsor's participation is generally constructive.

4 The State Defendants support the Motion to Intervene.

5 || DATED this 25th day of July 2022.

ROBERT W. FERGUSON
Attorney General

/s/ R. July Simpson

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1 **DECLARATION OF SERVICE**

2 I hereby declare that on this day I caused the foregoing document to be electronically
3 filed with the Clerk of the Court using the Court's CM/ECF System which will send notification
4 of such filing to all counsel of record.

5 I declare under penalty of perjury under the laws of the State of Washington and the
6 United States of America that the foregoing is true and correct.

7 DATED this 25th day of July 2022, at Tacoma, Washington.

8 _____
9 */s/ R. July Simpson*
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10 Assistant Attorney General
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